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USDC SDNY DOCUMENT

UNITED STATES DISTRICT COURTECTRONICALLY FILED SOUTHERN DISTRICT OF NEW

DRIC #:

DATE FILED: 2

IN RE DIDI GLOBAL INC. SECURITIES LITIGATION

Master Docket 1:21-cv-05807-LAK

This Document Relates To: All Actions

STIPULATION AND [PROPOSED] ORDER REGARDING BRIEFING OF PLAINTIFFS' MOTION TO COMPEL DOCUMENTS WITHHELD ON THE BASIS OF PRC LAW

WHEREAS, on February 3, 2025, Plaintiffs filed a letter motion to compel the production of documents that Defendant DiDi Global, Inc. ("DiDi") withheld or redacted on the basis of PRC law. ECF 276.

WHEREAS, following the Court's order on Plaintiffs' motion to compel, DiDi served revised logs on March 20, 2025, and served further revised logs on April 11, 2025;

WHEREAS, on May 7, 2025, DiDi informed Plaintiffs that it has received authorization to produce certain documents currently being withheld on the basis of PRC law;

WHEREAS, Plaintiffs intend to file a motion to compel specific documents or categories of documents from DiDi's PRC law logs, and, depending on the volume of DiDi's anticipated production, Plaintiffs anticipate challenging more than 1,000 documents;

WHEREAS, given the volume of documents at issue, the parties have agreed to additional pages and time (beyond those allowed for discovery disputes in Your Honor's Individual Practices and Rules) to brief the motion to compel.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the Court's approval:

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- Plaintiffs shall file a motion to compel certain documents DiDi is withholding based on PRC blocking statutes by May 16, 2025;
- 2. DiDi shall file an opposition to Plaintiffs' motion by June 6, 2025;
- Plaintiffs shall file any reply (if necessary) in further support of their motion by June
 13, 2025; and
- Plaintiffs' opening brief and DiDi's opposition shall be a maximum of 15 doublespaced pages, and Plaintiffs' reply brief shall be a maximum of 7 double-spaced pages.

Respectfully submitted,

/s/ Corey Worcester

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Counsel for Defendants DiDi Global, Inc., Will Wei Cheng, Jean Qing Liu, Stephen Jingshi Zhu, Alan Yue Zhuo, Daniel Yong Zhang, Adrian Perica, and Kentaro Matsui Dated: May 12, 2025

/s/ Laurence Rosen

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Lead Counsel for Lead Plaintiff and the Class

SO ORDERED.

DATED: 5/14

Hon. Lewis A. Kaplan, U.S. District Judge

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CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that on this 12th day of May, 2025, this document filed through the ECF system will be sent electronically to the registered participants on the Notice of Electronic Filing and paper copies will be sent to any non-registered participants.

/s/ Laurence Rosen